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RYAN WILSON

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYAN WILSON,

Defendant.

Case No. 1:21-cr-00315-DAD-BAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER**

Date: August 24, 2022

Time: 1:00 p.m.

Judge: Hon. Barbara A. McAuliffe

IT IS HEREBY STIPULATED by and between the parties through their respective counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant Federal Defender Reed Grantham, counsel for Ryan Wilson, that the status conference currently scheduled for May 11, 2022, at 1:00 p.m. may be continued to August 24, 2022, at 1:00 p.m.

Mr. Wilson made his initial appearance in this matter on December 15, 2021. *See* Dkt. #4. An Indictment issued on December 16, 2021. *See* Dkt. #9. On December 20, 2021, the matter was set for a first status conference to occur on February 9, 2022, and then continued to May 11, 2022. *See* Dkt. #11, #17.

On May 13, 2020, this Court issued General Order 618, which extended the previous restrictions on courthouse access and in-court hearings until further notice from the Court. This General Order was entered to address public health concerns related to COVID-19. By this stipulation, the parties now move to continue the current status conference until August 24, 2022,

1 and to exclude time between May 11, 2022, and August 24, 2022, under 18 U.S.C. §§
2 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv).

3 The parties agree and stipulate, and request that the Court find the following. The
4 government has provided initial discovery in this matter. The defense remains in the process of
5 reviewing the discovery with his client and is conducting further investigation. For the above
6 reasons, the defense requires additional time to discuss the case with his client, to conduct any
7 further investigation and research, and to participate in any plea negotiation discussions with the
8 government.

9 The requested continuance will conserve time and resources for the parties and the Court.
10 Counsel for defendant believes that failure to grant the above-requested continuance would deny
11 him the reasonable time necessary for effective preparation, taking into account the exercise of
12 due diligence. The government does not object to the continuance.

13 Based on the above-stated findings, the ends of justice served by continuing the case as
14 requested outweigh the interest of the public and the defendant in a trial within the original date
15 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial
16 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 11,
17 2022, to August 24, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. §§
18 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by
19 the Court at defendant's request on the basis of the Court's finding that the ends of justice served
20 by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

21 Respectfully submitted,

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23 PHILLIP A. TALBERT
United States Attorney

24 Date: May 5, 2022

25 /s/ Kimberly Sanchez
26 KIMBERLY SANCHEZ
Assistant United States Attorney
Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: May 5, 2022

/s/ Reed Grantham
REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
RYAN WILSON

ORDER

IT IS SO ORDERED. The status conference currently scheduled for May 11, 2022, at 1:00 p.m. is hereby continued to **August 24, 2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. The time period of the date of this order to August 24, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: May 5, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE